

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

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WALTER HERBERT RICE

UNITED STATES OF AMERICA,)	No.
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	18 U.S.C. § 2422(b)
)	18 U.S.C. § 2423(b)
DAVID ZOBEL,)	FORFEITURE
)	
Defendant.)	

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 2422(b) - Coercion and Enticement of a Minor]

Between on or about December 19, 2008 and on or about June 2, 2009, in the Southern District of Ohio, and elsewhere, defendant **DAVID ZOBEL** knowingly used any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years -- namely, a minor identified herein by the initials J.C. -- to engage in any sexual activity for which any person could be charged with an offense -- namely, unlawful sexual conduct with a minor in violation of the Ohio Revised Code, Sec. 2907.04(A); sexual imposition in violation of the Ohio Revised Code, Sec. 2907.06(A)(4); and importuning in violation of the Ohio Revised Code, Sec. 2907.07(B) and (D)(1).

In violation of Title 18, United States Code, Sec. 2422(b).

COUNT TWO

[18 U.S.C. § 2422(b) - Coercion and Enticement of a Minor]

On or about June 2, 2009, in the Southern District of Ohio, and elsewhere, defendant **DAVID ZOBEL** knowingly used any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years -- namely, a minor identified herein by the initials B.B. -- to engage in any sexual activity for which any person could be charged with an offense -- namely, rape in violation of the Ohio Revised Code, Sec. 2907.02(A)(1)(B); gross sexual imposition in violation of Ohio Revised Code, Sec. 2907.05(A)(4); and importuning in violation of the Ohio Revised Code, Sec. 2907.07(A) and (C)(1).

In violation of Title 18, United States Code, Sec. 2422(b).

COUNT THREE

[18 U.S.C. § 2423(b) - Travel with Intent to Engage
in Illicit Sexual Conduct with a Minor]

In or around January 2009, in the Southern District of Ohio, and elsewhere, defendant **DAVID ZOBEL** traveled in interstate commerce -- namely, from Michigan to Ohio -- for the purpose of engaging in any illicit sexual conduct with another person -- namely, a minor identified herein by the initials J.C.

In violation of Title 18, United States Code, Sec. 2423(b).

COUNT FOUR

[18 U.S.C. § 2423(b) - Travel with Intent to Engage
in Illicit Sexual Conduct with a Minor]

On or about June 2, 2009, in the Southern District of Ohio,
and elsewhere, defendant **DAVID ZOBEL** traveled in interstate
commerce -- namely, from Michigan to Ohio -- for the purpose of
engaging in any illicit sexual conduct with another person --
namely, a minor identified herein by the initials J.C.

In violation of Title 18, United States Code, Sec. 2423(b).

COUNT FIVE

[18 U.S.C. § 2423(b) - Travel with Intent to Engage
in Illicit Sexual Conduct with a Minor]

On or about June 2, 2009, in the Southern District of Ohio,
and elsewhere, defendant **DAVID ZOBEL** traveled in interstate
commerce -- namely, from Michigan to Ohio -- for the purpose of
engaging in any illicit sexual conduct with another person --
namely, a minor identified herein by the initials B.B.

In violation of Title 18, United States Code, Sec. 2423(b).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in this Indictment, the defendant, **DAVID ZOBEL**, shall forfeit to the United States pursuant to 18 U.S.C. § 2428(a)(1) any property, real or personal, that was used or intended to commit or to facilitate the commission of such violation, and 18 U.S.C. § 2428(b)(1)(A) any property, real or personal used or intended to be used to commit or to facilitate the commission of any violation, including, but not limited to, the following:

- A. Macintosh Laptop; and
- B. Apple i phone.

A TRUE BILL

JS/
Foreperson

GREGORY G. LOCKHART
United States Attorney



VIPAL J. PATEL
Deputy Criminal Chief